

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE:)	CASE NO. 15-41302
)	
MICHAEL J. ENSELL)	CHAPTER 7
KELLY J. ENSELL)	
)	JUDGE KAY WOODS
)	
Debtor(s))	RESPONSE AND REQUEST FOR
)	HEARING ON MOTION OF TERRY
)	NEWHART, SR., TERRY NEWHART, JR.,
)	TODD NEWHART, NORTH EAST FIRE
)	PROTECTION LLC AND 1286 BEECH
)	STREET LLC FOR RELIEF FROM STAY

Now comes Michael D. Buzulencia, Chapter 7 Trustee for Debtors, and requests a hearing on the Motion for Relief from Stay filed by Terry Newhart, SR., Terry Newhart, JR., Todd Newhart, North East Fire Protection LLC AND 1286 Beech Street LLC on September 15, 2015, for the reason that it appears Trustee may have rights in assets of creditor, which it would seek to enforce through this court. Trustee is awaiting information from creditor to determine same, which they have indicated cannot be provided for 45 days.

Trustee may additionally need to take 2004 exams of creditors principals and debtor, to determine the rights of the estate after review of creditors documents.

/s/ Michael D. Buzulencia
MICHAEL D. BUZULENCIA
Chapter 7 Trustee
150 E. Market St.
Suite 300
Warren, Ohio 44481
(330) 392-8551
Fax no. (330) 392-7030
Buzulenciatrustee@mahoningvalleylaw.com
OHIO BAR REG. NO. 0015291

CERTIFICATE OF SERVICE

I certify that on October 13, 2015, a true and correct copy of Trustee Michael D. Buzulencia's Response and Request for Hearing was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice list:

U.S. Trustee
Howard M. Metzenbaum U.S. Court House
201 Superior Ave., Room 441
Cleveland, OH 44114

Jane Timonere, Attorney on behalf of Debtors at jane@timonere.com

Thomas J. Connick, Attorney for Movants at tconnick@connicklawllc.com

And by regular U. S. Mail. Postage prepaid on:

Michael J. Ensell
Kelly J. Ensell
4895 State Route 84
Conneaut, OH 44030

/s/ Michael D. Buzulencia
MICHAEL D. BUZULENCIA
Chapter 7 Trustee